

Claims 1-6, 16-18 were rejected under 35 U.S.C. § 102(e) as being anticipated by Motoi et al. (US 6,480,016). As discussed below, applicants respectfully disagree.

Claim 1 of the present application recites a method that includes:

generating event signals;
storing the event signals in a holding circuit;
producing response signals in a device under test (DUT) in response to the event signals; and
evaluating the DUT based on a comparison of the response signals from the DUT with the stored event signals received from the holding circuit.(Emphasis Added)

Applicant respectfully re-asserts that the Motoi patent fails to disclose the above bolded features for at least the following reasons.

FIG. 1 of the Motoi patent shows a tester body 101 that is used to transmit and receive signals to and from a device 103 contained on a test board 102. Although FIG. 1 shows 1 **single** wire between the tester body 101 and circuits 106a, 106b, the tester body 101 sends **two** different signals at two different times: an input signal is sent to circuit 106a at one time and an expectation output signal is sent to circuit 106b at a different time. The operation of the circuit is explained in column 3, lines 24-42 of the Motoi reference.

In operation, an *input signal* is read from the first storage 105a via the storage control circuit 106a and is supplied to the device 103. An *output signal* in response to the *input signal* is output from the device 103 and fed to a comparator 107. An *expectation value signal* corresponding to the input signal is output from the second storage 105b and fed to the comparator 107. The *expectation value signal* is a signal having a value that is expected from the device in response to an input signal when the device is operating normally. The comparator 107 compares the *output signal* from the device 103 (the response from the device) with the *expectation value signal* (the expected response from the device) from the tester body. Although the *input signal* is stored in the first storage 105a and then fed to the device 103, the comparator 107 does not **compare** the *input signal* with the *output signal* as claimed in the current invention. That is, the Motoi patent **compares** the actual output response from the device with the expected output response, whereas, claim 1 of the present invention recites an apparatus that evaluates the DUT based on "a comparison of the response signals from the DUT

with the stored event signals received from the holding circuit.” Therefore, claim 1 and dependent claims 2-6 are not anticipated by the Motoi reference for at least this reason.

Moreover, the Motoi patent fails to teach an apparatus that is configured for “producing response signals in a device under test (DUT) in response to the event signals” as recited in claim 1. Rather, in the Motoi patent, the device produces the *output signal* in response to the *input signal* and not in response to the *expectation value signal*. As mentioned above, the expectation value signal is a predetermined expected value that should be produced from the device in response to an input signal when the device is operating normally. Thus, claim 1 is not anticipated by the Motoi patent for at least these additional reasons.

Accordingly, since claim 1 is not anticipated, dependent claims 2-6 are also not anticipated.

Claim 16 recites a system that includes a holding circuit for receiving the event signals and trigger signals, and for capturing the event signals, and a measuring device for evaluating the DUT based on a comparison of the response signals from the DUT with the captured event signals from the holding circuit. Claim 16, as well as dependent claims 17 and 18, should be allowable for at least the reasons discussed above.

Consequently, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 102(e) rejection.

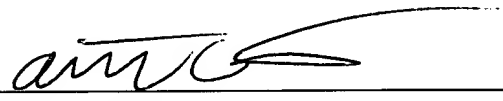
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